

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

TERRY PAGE,)	
Plaintiff,)	
·)	CIVIL ACTION NUMBER: 2:18-cv-01754-JHE
DOATDICHT COMPANY INC	j	
BOATRIGHT COMPANY, INC.,)	
Defendant.)	

MOTION FOR ADDITIONAL TIME TO RESPOND TO COMPLAINT

COMES NOW, Boatright Company, Inc., Defendant in the above-styled action ("Defendant"), by and through its counsel of record, and respectfully requests that this Court grant it a twenty-one (21) day extension of time to respond to Plaintiff's Complaint. As grounds therefore, Defendant states as follows:

- 1. Plaintiff filed this lawsuit on or about October 23, 2018.
- 2. The undersigned counsel have recently been retained to represent Defendant in this action.
- 3. Defendant has not yet completed its investigation of the allegations contained in Plaintiff's Complaint, including but not limited to which defenses may operate to bar Plaintiff's claims.

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A twenty-one (21) day extension of the deadline for filing an answer 4.

would allow Defendant to complete its investigation and file a more complete and

thorough response to Plaintiff's Complaint.

The additional time will not prejudice the parties insofar as this 5.

motion constitutes Defendant's initial appearance, allowing the parties to proceed

with scheduling the parties' planning meeting.

Plaintiff's counsel has been consulted and has no objection to the 6.

granting of this motion.

PREMISES CONSIDERED, Defendant respectfully WHEREFORE,

requests the Court to allow it an additional twenty-one (21) days, up to and

including December 7, 2018, to respond to Plaintiff's complaint.

Respectfully Submitted,

s/ Michael L. Thompson

Michael L. Thompson

ASB-5417-O46M

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following

Allen D. Arnold, Esq. Five Points Law Group 2151 Highland Avenue South, Suite 205 Birmingham, Alabama 35205

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s/ Michael L. Thompson
OF COUNSEL

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